

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

NATIONAL ASSOCIATION FOR GUN  
RIGHTS, INC., *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, IN HIS  
OFFICIAL CAPACITY AS ATTORNEY  
GENERAL OF THE UNITED STATES,  
*et al.*,

Defendants.

Case No. 4:23-cv-00830-O

**UNOPPOSED MOTION TO STAY DEADLINE TO RESPOND TO COMPLAINT**

Defendants respectfully request that the Court stay the current deadline for Defendants to file an answer or otherwise respond to the Complaint. Defendants' current deadline to file an answer or otherwise respond to the Complaint is October 28, 2023. ECF No. 54. The parties have conferred and agree that the remainder of this case can be resolved on cross-motions for summary judgment.<sup>1</sup> As such, the filing of an answer or a motion to dismiss at this time would produce unnecessary briefing that will not assist the parties or the Court in reaching a final judgment. In order to promote efficiency and preserve judicial resources, Defendants request that their deadline to file an answer or otherwise respond to the Complaint be stayed until after the Court issues a decision on

---

<sup>1</sup> The parties are currently discussing a proposed schedule for summary judgment briefing.

the parties' forthcoming cross-motions for summary judgment. Plaintiffs do not oppose the relief sought in this motion.

DATED: October 25, 2023

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

BRIGHAM J. BOWEN  
Assistant Branch Director

/s/ Michael P. Clendenen  
MICHAEL P. CLENDENEN  
LAURA B. BAKST  
ALEXANDER W. RESAR  
Trial Attorneys  
Civil Division, Federal Programs Branch  
U.S. Department of Justice  
1100 L Street, NW  
Washington, DC 20005  
Phone: (202) 305-0693  
E-mail: michael.p.clendenen@usdoj.gov

*Counsel for Defendants*

On October 25, 2023, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Michael P. Clendenen